

# START

0023002

Incoming:9205506



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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Mr. Ron D. Izatt  
United States Department of Energy  
P.O. Box 550  
Richland, WA 99352

Re: 3718-F Alkali Metal Treatment and Storage Facility Closure Plan  
DOE/RL-91-35

Dear Mr. Izatt:

We have reviewed this plan, inspected the site, and have the following comments:

Page/Line

- 6-1/10 We do not consider the records at the Hanford Site to be definitive. If hazardous materials were stored in the facility, then a minimum number of wall samples should be taken.
- 6-1/24 Background will be taken from the sitewide background study now in progress, not from samples taken in the vicinity of this facility.
- 6-2/37 Since soil remediation will be conducted in accordance with the provisions of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), contract laboratory procedures (CLP) are standard procedure for testing soils. SW-846 (1990) is standard procedure for Resource Conservation and Recovery Act (RCRA) site closures. Please use the appropriate procedure.
- 7-2/26 See 6-2/37
- 7-3/21 See 6-1/24
- 7-4/38 Delete the phrase "where they exist".
- 7-5/8 State which EPA document is referred to here.
- 7-5/10 State what TCLP solvent will be used.
- 7-5/33 See 7-5/8
- 7-8/5 Add "Sample bottles selection and preparation shall be in



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accordance with 40 CFR 136.3.

- 7-8/12 48 hours is too long for some tests, chromium for example. Sampling plans should include tables of maximum holding times for those substances requiring faster action.
- 7-9/14 Duplicates should also be used assess the precision associated with sample collection preservation and storage.
- 7-9/29 Delete "for soil and concrete samples".
- 7-10/17 Add matrix and soil type.
- 7-10/23 Samples are to be in the custody of one person who is solely responsible for the disposition of the sample.
- 7-10/26 Provide a chain of custody form.
- 7-11/4 See 6-2/37
- 7-11/5 EPA detection limits are not goals, but limits to be observed during analysis.
- 7-11/13 The QA/QC criteria for CLP must also be followed where applicable.

General comment: Westinghouse and DOE forms are specified throughout this plan. Care should be taken to insure that these forms comply with EPA forms.

If you have any questions about this letter, please call me at (206) 438-7558.

Sincerely,



Gary Anderson, P.E.  
Environmental Engineer 3  
Nuclear and Mixed Waste Management

GA:jw

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Subject: 3718-F ALKALI METAL TREATMENT AND STORAGE FACILITY CLOSURE PLAN  
DOE/RL-91-35

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